

IN THE COUNTY COURT OF THE TENTH JUDICIAL CIRCUIT, CRIMINAL DIVISION
IN AND FOR POLK COUNTY, FLORIDA

CASE NO: 53-2021-MM-006542-A000-BA
AGENCY REPORT NO: PCSO 2021-043438

DIVISION M4

STATE OF FLORIDA

VS.

DISCOVERY EXHIBIT
DEMAND FOR RECIPROCAL DISCOVERY

BRANDON LEE CASE

The State of Florida, by and through the undersigned Assistant State Attorney, hereby responds to the Notice of Discovery filed on behalf of the Defendant, pursuant to Rule 3.220(a)&(b), Florida Rules of Criminal Procedure. The State hereby demands reciprocal discovery and all disclosure required by the Defendant, pursuant to Rule 3.220(a)(c)&(d), Florida Rules of Criminal Procedure.

NOTICE IS HEREBY GIVEN that all information and material as defined by Rule 3.220(a), Florida Rules of Criminal Procedure, within the State's possession or control has been disclosed by providing copies of all reports and statements in the State Attorney's file to the Attorney for the Defendant.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the Answer to Demand for Discovery and Demand for Reciprocal Discovery has been furnished to OFFICE OF THE PUBLIC DEFENDER - 10TH CIRCUIT, , on this 27th day of December, 2021 by e-service,.

/s RALPH MAIOLINO III
ASSISTANT STATE ATTORNEY
FLORIDA BAR NUMBER: 1033210

By: JWM/MLR

Defendant's Name: BRANDON LEE CASE
Case Number: 53-2021-MM-006542-A000-BA

(A) LIST OF PERSONS KNOWN TO HAVE INFORMATION

WITNESS CATEGORY A

THE BELOW OFFICERS DESIGNATED UNDERCOVER MUST BE DEPOSED AT THE STATE ATTORNEY'S OFFICE.

TIA BAMBERG
ATTN: PARENT OR GUARDIAN
1140 TAYLOR ST
AUBURNDAL FL 33823

MS MELANIE CASE
POST OFFICE BOX 191
LIVERPOOL TX 77577

JEFFREY CASE
1140 TAYLOR ST
AUBURNDAL FL 33823

911 VALARIE HOERLER
POLK COUNTY SHERIFF'S OFFICE
1891 JIM KEENE BLVD
WINTER HAVEN FL 338808010

SHALYNN MELTON
1140 TAYLOR ST
AUBURNDAL FL 33823

SARAH MORGAN
ATTN: PARENT OR GUARDIAN
1140 TAYLOR ST
AUBURNDAL FL 33823

HANNAH MOSLEY
1148 TAYLOR ST
AUBURNDAL FL 33823

DS ADAM DALE PAUTZ
POLK COUNTY SHERIFF'S OFFICE
1891 JIM KEENE BLVD
WINTER HAVEN FL 338808010

(B) **Witness Statement**

Oral ☒

Verbatim Recital ☐

Written ☒

Recorded ☐

All Statements by Person in (A) ☒

All Statements in Offense Reports ☒

Witness: See all reports and lists

Substance: See all reports and lists

(C) **Accused Statement**

Oral ☒

Verbatim Recital ☐

Written ☐

Recorded ☐

All Statements by Person in (A) ☒

All Statements in Offense Reports ☒

Witness: See all reports and lists

Substance: See all reports and lists

(D) **Co-Defendant Statement**

Oral ☐

Verbatim Recital ☐

Written ☐

Recorded ☐

All Statements by Person in (A) ☐

All Statements in Offense Reports ☐

Witness: See all reports and lists

Substance: See all reports and lists

☐ There is a co-defendant. Pursuant to Florida Rule of Criminal Procedure 3.220, deposition of witnesses must be coordinated with other counsel.

(E) Accused's Grand Jury Testimony ☐

(F) Object's Accused – See (K) ☒

(G) Confidential Information ☐

(H) Electronic Surveillance ☐

(I) Search and Seizure ☒

(J) Expert Report: (Unless name indicated, name to be provided later.)

Chemist ☐

Micro-analyst ☐

Fingerprint ☐

Atomic Absorption ☐

Doctor ☐

Serologist ☐

Firearms ☐

Handwriting ☐

Document ☐

Computer Forensics ☐

Drug Paraphernalia ☐

DNA ☐

Computer/Internet Customs, Language Operations ☐

Drug Recognition ☐

Drug Customs, Identification, Language, Operations ☐

(K) Trial Exhibits: (See Below) ☒

(L) Potential DNA Evidence ☐

(4) Information Negating Guilt ☒

☐ Column checked only if there's a video or audio Tape

Note: Defense counsel may copy, listen to, and/or view audio/video tape recordings at the originating law enforcement agency.

(K) TRIAL EXHIBITS(S):

911 RECORDING
ARREST REPORT
BOOK IN PHOTO & BOOK IN SHEET
CHAIN OF CUSTODY DOCUMENTS
COMPLAINT AFFIDAVIT
DEFENDANT STATEMENT(S)
INVENTORY AND RECEIPT
INVESTIGATIVE COSTS AFFIDAVIT
ITEMS LISTED IN OFFENSE REPORTS
ITEMS ON PROPERTY RECEIPTS
MIRANDA WARNING
OFFENSE REPORT
PHOTOGRAPH - DIGITAL
PROBABLE CAUSE AFFIDAVIT
WITNESS AFFIDAVIT
WITNESS STATEMENT
WRITTEN STATEMENT
LETTERS FROM VICTIMS
SEE ALL EVIDENCE LIST

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VS.

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DEMAND FOR ALIBI

The undersigned Assistant State Attorney, having filed the foregoing Discovery, hereby Demands a Notice of Intention to Claim Alibi pursuant to Fla. R. Crim. P. 3. 200.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the above and foregoing has been furnished by RALPH MAIOLINO III to OFFICE OF THE PUBLIC DEFENDER - 10TH CIRCUIT, , Attorney for Defendant, on the 27th day of December, 2021 by e-service.

/s RALPH MAIOLINO III
Assistant State Attorney
Bar Number: 1033210
255 N. BROADWAY AVE
BARTOW, FL 33830